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May 3, 2024

**MEMO ENDORSED**

**Via ECF**

Honorable Dale E. Ho  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Bryan Montero, et al. v. Primo Home Services Installation Inc., et al.  
Case No.: 23-cv-07340-DEH

Dear Judge Ho:

This firm represents Defendants, Primo Home Services Installation, Inc. and Braulio Rodriguez (collectively, the “Defendants”), in the above-captioned matter. We are writing to respectfully request a brief extension of the deadline for the parties to file a motion for settlement approval, from May 3, 2024 to May 10, 2024. This is the parties’ second request for an extension of time to file a motion for settlement approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015). The terms of the forthcoming settlement agreements has been fully negotiated, but this adjournment request is respectfully requested to provide the parties additional time to fully execute the settlement agreement. Plaintiffs’ counsel has consented to this request.

We thank the Court for its time and consideration of this request.

Respectfully Submitted,  
Kaufman Dolowich LLP



Edward Grimmett

cc: All counsel of record (via ECF) **Application GRANTED. The parties shall file their motion for settlement approval under *Cheeks* by May 10, 2024. So Ordered.**

4886-1579-4322, v. 1

**The Clerk of Court is respectfully directed to close the motion at ECF No. 27.**



**Dale E. Ho**  
**United States District Judge**  
**Dated: May 6, 2024**  
**New York, New York**